

AO 91 (Rev 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
District of New Mexico



United States of America
v.
Keenan Mathio RATTLIFF
and
Jasmine Nicole WILLIAMS

Case No. 21MJ389

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 25, 2021 in the county of Bernalillo in the
District of New Mexico, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 USC §§ 841(a)(1) and (b)(1)(A)	Possession with intent to distribute 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Complainant's signature

Jarrell W. Perry, Special Agent DEA

Printed name and title

Telephonically sworn and electronically signed.

Date: 03/26 2021

Judge's signature

B. Paul Briones, US Magistrate Judge

Laura Briones, US Magistrate Judge

Printed name and title

City and state: Albuquerque, New Mexico

AFFIDAVIT

On March 25, 2021, Drug Enforcement Administration (DEA) Special Agent (S/A) Jarrell W. Perry and DEA Task Force Officer (TFO) Rey Zammaron were at the Greyhound bus station in Albuquerque, New Mexico to check the eastbound Greyhound bus that makes a regularly scheduled stop in Albuquerque, New Mexico.

S/A Perry boarded the bus and began speaking with the various passengers as they reboarded and sat down in their respective seats. S/A Perry displayed his DEA badge to a male, later identified as Keenen Mathio RATTLIFF, and a female, later identified as Jasmine Nicole WILLIAMS, identified himself as a police officer to RATTLIFF and WILLIAMS, asked for and received permission to speak with RATTLIFF and WILLIAMS. S/A Perry learned that RATTLIFF and WILLIAMS were traveling together.

S/A Perry asked RATTLIFF and WILLIAMS if they had any luggage with them and RATTLIFF identified a backpack that was lying on the floor between his feet as belonging to him. WILLIAMS identified a black satchel and black drawstring type bag that were lying on the floor near her feet as belonging to her. S/A Perry asked for and received voluntary permission from RATTLIFF to search his backpack for contraband and also asked for and received voluntary permission from WILLIAMS to search her black satchel and black drawstring type bag for contraband.

A consensual search of RATTLIFF's backpack revealed numerous clear plastic wrapped bundles containing a crystal substance. A consensual search of WILLIAMS' black satchel and black drawstring type bag revealed numerous clear plastic wrapped bundles also containing a crystal substance. S/A Perry knew from his training and experience that the clear plastic wrapped bundles containing a crystal substance were consistent with bundles of illegal narcotics, specifically crystal methamphetamine.

RATTLIFF and WILLIAMS were handcuffed, thus placing them under arrest.

RATTLIFF and WILLIAMS removed from the Greyhound bus and transported to the DEA Albuquerque District Office by S/A Perry and TFO Zamarron.

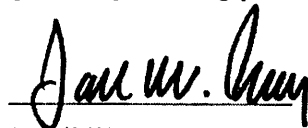
At the DEA ADO, S/A Perry, TFO Victor Savedra and TFO Zamarron removed thirteen clear plastic wrapped bundles from RATTLIFF's backpack. S/A Perry, TFO Savedra and TFO Zamarron weighed the bundles and determined the total weight to be approximately 8.80 gross kilograms. S/A Perry, TFO Savedra and TFO Zamarron conducted a field-test of the clear crystal substance from one of the bundles, which gave a positive reaction for the presence of methamphetamine.

At the DEA ADO, S/A Perry, TFO Savedra and TFO Zamarron removed seven clear plastic wrapped bundles from WILLIAMS' black satchel and black drawstring type bag. S/A Perry, TFO Savedra and TFO Zamarron weighed these bundles and determined their total weight to be approximately 6.55 gross kilograms. S/A Perry, TFO Savedra and TFO Zamarron conducted a field-test of the clear crystal substance from two of the bundles, which gave a positive reaction for the presence of methamphetamine.

S/A Perry knew that based upon his training and experience that this amount is an amount that is consistent with distribution rather than personal use.

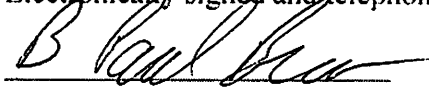
Based on the above stated facts, I believe there is probable cause to charge both Keenan Mathio RATTLIFF and Jasmine Nicole Williams with a violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), that being Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine.

This affidavit is submitted for the limited purpose of providing probable cause to support the attached criminal complaint.



Jarrell W. Perry
Special Agent
Drug Enforcement Administration

Electronically signed and telephonically sworn.

A handwritten signature in black ink, appearing to read "B. Paul Briones", written over a horizontal line.

B. Paul Briones, US Magistrate Judge
~~Paul Briones~~
United States Magistrate Judge